

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,

STATE OF ILLINOIS, and

STATE OF MINNESOTA,

Plaintiffs,

v.

GTCR, LLC,

GTCR BC HOLDINGS, LLC, and

SURMODICS, INC.,

Defendants.

Case No. 1:25-cv-02391

Hon. Jeffrey I. Cummings

**JOINT MOTION FOR ENTRY OF [PROPOSED]
STIPULATED ORDER CONTINUING PLAINTIFFS'
RESPONSE TO DEFENDANTS' COUNTERCLAIMS**

Plaintiffs Federal Trade Commission (“FTC”), the State of Illinois, and the State of Minnesota (collectively, “Plaintiffs”) and Defendants GTCR, LLC, GTCR BC Holdings, LLC, and Surmodics, Inc. (collectively, “Defendants,” together with Plaintiffs, the “Parties”) respectfully request that the Court enter their [Proposed] Stipulated Order continuing the deadline for Plaintiffs to respond to the Counterclaims filed by Defendants, until December 1, 2025. In support, the Parties state the following:

1. The FTC filed its Complaint against Defendant GTCR BC Holdings, LLC and Defendant Surmodics, Inc. on March 6, 2025 (ECF No. 1).

2. Defendant GTCR BC Holdings, LLC and Defendant Surmodics, Inc. served Counterclaims against the Commission on April 16, 2025 (ECF Nos. 49, 51, 73, 83).
3. The FTC filed an Amended Complaint adding the State of Illinois and the State of Minnesota as Plaintiffs and GTCR LLC as a Defendant on April 16, 2025 (ECF No. 66).
4. On June 10, 2025, the FTC filed an Unopposed Motion to Continue Its Response to Defendants' Counterclaims until September 19, 2025, given Defendant GTCR's then forthcoming deadline to answer or otherwise plead as well as the August 21, 2025 preliminary injunction hearing (ECF No. 119).
5. On June 10, 2025, the Court granted the FTC's Unopposed Motion to Continue Its Response to Defendants' Counterclaims, and ordered that the FTC's response shall be filed by September 19, 2025 (ECF No. 120).
6. GTCR LLC answered the Amended Complaint on June 30, 2025 (ECF No. 162).
7. The Court held the preliminary injunction hearing from August 21, 2025 through September 2, 2025 (ECF No. 416) (transcript of proceedings).
8. The Parties submitted post-hearing proposed findings of fact and conclusions of law on September 16, 2025 (ECF Nos. 418, 419).
9. Given Plaintiffs' pending request for a preliminary injunction, the Parties have conferred and agree to continue the deadline for Plaintiffs to file a response to Defendants' Counterclaims until December 1, 2025, and the deadline for Defendants to file their opposition to Plaintiffs' response until December 29, 2025.

September 19, 2025

/s/ Heather A. Waller

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